

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

JOSEAN DOMENECH ROBLES
Defendants.

CRIMINAL NO. 17-498 (JAG)

UNITED STATES' RECIPROCAL DISCOVERY REQUEST

TO THE HONORABLE COURT:

COMES NOW, the United States of America, by and through the undersigned attorneys and very respectfully states and prays as follows:

1. The United States informs that it has not received any discovery from the Defendant. As such, the United States makes a request for the following:
 - a. Immediate disclosure by Defendants of all evidence discoverable under Federal Rule of Criminal Procedure 16(b)(1)(A), (B) and (C); and 16(c).
 - b. Notice of Defendants' intention (if any) to offer the defense of alibi under Federal Rule of Criminal Procedure 12.1.
 - c. Notice of Defendants' intention (if any) to use an insanity defense or expert testimony as to mental condition, under Federal Rule of Criminal Procedure 12.2.
 - d. Notice of Defendants' intention (if any) to use the defense of entrapment, under

Federal Rule of Criminal Procedure 12(b).

- e. Notice of Defendants' intention (if any) to use a defense of duress or coercion, under Federal Rule of Criminal Procedure 12(b).
- f. Notice of Defendants' intention (if any) to use a defense based upon public authority under the provisions of Federal Rule of Criminal Procedure 12.3.

WHEREFORE, the United States respectfully requests the Court **GRANT** the United States' petition for reciprocal discovery.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of July, 2018.

ROSA EMILIA RODRIGUEZ VELEZ
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

S/Omar A. Barroso-Rosario
U.S.D.C. No. G02709